

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

2006 MAR -5 AM 11:56

JOHN J. HRIBEK

Plaintiff

v.

BUC-EE'S, LTD.,
A/K/A BUC-EE'S, INC.

Defendant

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CIVIL ACTION NO.

A06CA 165 LY

DEFENDANT'S NOTICE OF REMOVAL

Defendant, Buc-ee's, Ltd. ("Defendant"), files this Notice of Removal pursuant to 28 U.S.C. §§ 1441 and 1446, and as grounds for removal respectfully shows:

1. On November 28, 2005, John J. Hribek ("Plaintiff") filed Plaintiff's Original Petition and initiated an action identifying as Defendant, Buc-ee's, Ltd., in the 21st Judicial District of Lee County, Texas, bearing Cause No. 13,050 ("the State Court Action"). A jury was demanded in the State Court Action.

2. On February 13, 2006, the Defendant was served with a copy of a Citation (Exhibit "A") and Plaintiffs' Original Petition (Exhibit "B"). On March 3, 2006, Defendant filed its Original Answer (Exhibit "C").

3. In Plaintiff's Original Petition, Hribek brings claims against Defendant pursuant to the Family Medical Leave Act ("FMLA"). These claims give rise to federal question jurisdiction.

4. This Court possesses jurisdiction over Hribek's FMLA claim pursuant to 28 U.S.C. § 1331. This Court possesses jurisdiction over Hribek's remaining claims pursuant to 28 U.S.C. § 1367. Removal to this Court is appropriate pursuant to 28 U.S.C. § 1441.

1

5. This Notice of Removal is filed within the 30-day statutory time period for removal pursuant to 28 U.S.C. § 1446(b). Copies of the citation and pleadings filed in the State Court Action, prior to this Notice of Removal, are attached as Exhibits "A" thru "C."

6. Pursuant to 28 U.S.C. § 1446(a), Defendant files with this Notice of Removal the following documents identified as Exhibits on the attached Appendix of Exhibits Filed:

- A. Citation;
- B. Plaintiff's Original Petition;
- C. Defendant's Original Answer;
- D. Certified copy of the state court docket sheet; and,
- E. List of Counsel of Record.

7. Pursuant to 28 U.S.C. § 1446(d), Defendant has filed a copy of this Notice of Removal with the clerk of the state court in which the action has been pending, and have given notice thereof to all parties and all counsel of record.

8. On these grounds, Defendant hereby removes the referenced State Court Action to this Court on the 6th day of March, 2006.

Respectfully submitted,

MARTIN, DISIERE, JEFFERSON & WISDOM, L.L.P.

By: 

Elizabeth Mata Kroger
State Bar No. 13184385
Fed. I.D. No. 14166

808 Travis, Suite 1800
Houston, TX 77002
Telephone: (713) 632-1700
Facsimile: (713) 222-0101

ATTORNEY IN CHARGE FOR DEFENDANT
BUC-EE'S, LTD.

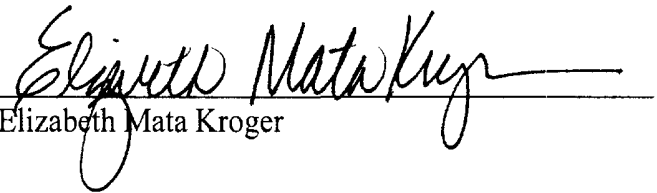
Of Counsel:

W. Jackson Wisdom
State Bar No. 21804025
Fed. I.D. No. 13753
MARTIN DISIERE, JEFFERSON & WISDOM, L.L.P.
808 Travis, Suite 1800
Houston, TX 77002
Telephone: (713) 632-1700
Facsimile: (713) 222-0101

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing pleading has been served via certified mail, return receipt requested, on this the 6th day of March, 2006 to:

Erica Hakimi
The Hakimi Law Firm, P.C.
1800 St. James Place, Suite 105
Houston, TX 77056


Elizabeth Mata Kroger

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

JOHN J. HRIBEK

Plaintiff

v.

BUC-EE'S, LTD.,
A/K/A BUC-EE'S, INC.

Defendant

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CIVIL ACTION NO. _____

APPENDIX OF EXHIBITS FILED

EXHIBITS:

- A. Citation
- B. Plaintiff's Original Petition
- C. Defendant's Original Answer
- D. Certified copy of the state court docket sheet
- E. List of Counsel of Record

EXHIBIT A

The State of Texas
CITATION – Cause No.13,050

Lisa Teinert
Clerk of the Court
289 South Main Street
P. O. Box 176
Giddings, Texas 78942

Attorney for Petitioner:
Erica Hakimi
1800 St. James Place, Suite 105
Houston, Texas 77056

TO: BUC-EE'S, LTD, a/k/a BUC-EE'S, INC.
C/O Arch H. Alpin, III, AGENT
101 Highway 2004
Lake Jackson, Texas 77566

“You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty (20) days after you were served this citation and petition, a default judgment may be taken against you.”

Defendant, Greetings:

You are hereby commanded to appear by filing a written answer to the PLAINTIFF'S ORIGINAL PETITION on or before ten o'clock a.m. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable 21ST Judicial District Court of Lee County, Texas at the Lee County District Court Building, 289 South Main, Giddings, Texas.

Said pleading was filed in said Court on the 28TH of November, 2005 in Cause No. 13,050 styled, JOHN T. HRIBEK and BUC-EE'S, LTD, a/k/a BUC-EE'S, INC. The nature of Plaintiff's demand is fully shown by a true and correct copy of the PLAINTIFF'S ORIGINAL PETITION accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

ISSUED AND GIVEN under my hand and seal of said court at Giddings, Lee County, Texas, this the 28TH day of November, 2005.

(Seal)

Certified Mail No.

Lisa Teinert, Clerk

By

Pshaun Jordan
Pshaun Jordan, Deputy

Service
Copy

Received 2-13-06, Adriana Petrosky @ State Farm

SHERIFF'S RETURN

Came to hand on (date) 02 09 06 at (time) 11⁰⁰ A.M.

*** Executed at (place) 101 Hwy (Fm) 2004 LAKE JACKSON, TX.

the County of BRAZORIA, at (time) 2⁰⁰ PM on
(date) 02 13 06, by delivering to the within-named ARCK H.

ALPIN, in person, a true copy of this Citation,

having first endorsed thereon the date of delivery, together with the accompanying true
and correct copy of the Plaintiff's Petition.

*** Not executed, the diligence used to execute being _____

and the cause of failure to execute this process is _____

and the information received as to the whereabouts of the said defendant being _____

My fees for service of this citation: \$ _____

TO CERTIFY WHICH WITNESS MY HAND OFFICIALLY.

Constable Fred Kanter

SHERIFF

Brazoria County Pct. 4

_____, COUNTY, TEXAS

J. K. Cobb
DEPUTY/CONSTABLE

DEPUTY

EXHIBIT B

JOHN J. HRIBEK

Plaintiff,
v.

BUC-EE'S, LTD., a/k/a BUC-EE'S, INC.

Defendant.

C. A. No.

13,050

In The

District Court

Lee County, Texas

21st Judicial District

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

1. INTRODUCTION

- 1.1. Plaintiff demands a JURY TRIAL in this employment discrimination and retaliation case under the Texas Labor Code (Hereafter, the "Labor Code") and state Common Law as to any and all issues triable to a jury. Plaintiff alleges Defendant BUC-EE'S, LTD., a/k/a BUC-EE'S, INC., violated the Act when Defendant BUC-EE'S, LTD., a/k/a BUC-EE'S, INC., took adverse personnel actions against Plaintiff.
- 1.2 COMES NOW, JOHN J. HRIBEK, (hereinafter referred to as "Plaintiff") complaining of and against BUC-EE'S, LTD., a/k/a BUC-EE'S, INC., (hereinafter referred to as "Defendant"), and for cause of action respectfully shows the court the following:

2. PARTIES

- 2.1. Plaintiff is an individual residing in LaGrange, Fayette County, Texas.
- 2.2. Defendant is an employer engaging in an industry affecting interstate commerce, and employs more than 15 regular employees. Defendant can be served by serving its agent for service, Arch H. Aplin, III, 101 Highway 2004, Lake Jackson, Texas 77566.

FILED

THE STATE OF TEXAS
COUNTY OF LEE
I, JAMES C. GORDON, District Clerk
do hereby certify that this
is a true and correct copy of the original
filed in my office on this day of NOV 28 2005

NOV 28 2005 4:28pm

FEB 28 2006

JAMES C. GORDON
DISTRICT CLERK
LEE COUNTY, TEXAS
DEPUTY



Arch H. Aplin, III
Agent for Service
101 Highway 2004
Lake Jackson, Texas 77566

FILED

3. VENUE

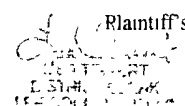
- 3.1. Venue of this proceeding is proper in Lee County, Texas pursuant to Texas Civil Practice & Remedies Code § 15.002 because Lee County is the county in which all or part of the cause of action accrued, and the county where Defendant maintains a residence, an agency or representative.

4. FACTS

- 4.1. Plaintiff is a 46-year-old male. He began working as a store manager for the Defendant on September 6, 2002. He was and is qualified to perform his job with Defendant.
- 4.2. In August 2004, Plaintiff informed the Defendant that he needed to take time off for a hernia surgery. He went out for surgery on September 22, 2004, and had planned to return to work on October 1, 2004.
- 4.3. The week before Plaintiff went out for surgery, Rhonda Roose, Assistant to the Vice President, told him she heard that he was going out for surgery. Plaintiff never told her that he was going to have surgery. Plaintiff indicated that he was going to have surgery, but was uncomfortable taking time off at that time. She asked Plaintiff if he was worried about his job and he told her he was.
- 4.4. Plaintiff asserted his rights under the Family Medical Leave Act.
- 4.5. On September 30, 2004, Plaintiff had a follow up visit with his doctor. The doctor wanted him to take another week off work. Plaintiff wanted to return to work so his doctor allowed him to return with certain restrictions.
- 4.6. Pursuant to Plaintiff's doctor's instructions, he was not able to lift over 20 pounds his first week back to work and could not lift over 40 pounds the following two weeks. Defendant and its agents were aware of his medical condition and restrictions.

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COUNTY OF LEE
is a true copy of the original

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- 4.7. Plaintiff called and let Defendant know that he would be returning to work on Monday October 4, 2004.
- 4.8. On Tuesday October 5, 2004, Pete Alexander, Assistant to the President, approached Plaintiff in the morning and told Plaintiff that Defendant has determined that he has lost interest in his job and asked Plaintiff for a letter of resignation.
- 4.9. On October 5, 2004, Plaintiff was forced to turn in his resignation letter to Defendant.
- 4.10. Defendant retaliated and discriminated against Plaintiff in violation of the Family Medical Leave Act, as amended.
- 4.11. Defendant discriminated against Plaintiff in violation of the Texas Labor Code based upon Plaintiff's disability or perceived disability and age (over 40).

5. TIMELINESS

- 5.1. Plaintiff brought this suit within sixty (60) days from the date of receipt of Texas Workforce Commission Civil Rights Division's issuance of the Notice of Right to File a Civil Action. (Exhibit "A").
- 5.2. Plaintiff filed Plaintiff's lawsuit within two years of the date Plaintiff filed Plaintiff's Charge of Discrimination. (Exhibit "B").

6. ADMINISTRATIVE CONDITIONS PRECEDENT

- 6.1. Plaintiff has completed all administrative conditions precedent since Plaintiff filed Plaintiff's charge of discrimination within 180 days of the date Plaintiff learned of the adverse employment action. (Exhibit "B").

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Plaintiff's Original Petition
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- 6.2. Jurisdiction is also appropriate since this action was filed on or before two years from the date Plaintiff filed Plaintiff's complaint with the Texas Workforce Commission Civil Rights Division. (Exhibit "B").

7. DAMAGES

- 7.1. As a direct and proximate result of the aforementioned arbitrary and capricious acts, the Plaintiff has suffered grievous harm, including, but not limited to, substantial loss of income; humiliation and embarrassment among co-workers and others; sustained damage to Plaintiff's credibility and sustained damage to Plaintiff's prospects for future employment.

8. EXEMPLARY DAMAGES

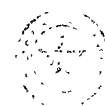
- 8.1. Defendant's actions were harsh, oppressive and malicious and as a further and proximate cause Plaintiff has suffered serious emotional distress due to Defendant's intentional infliction of emotional distress. The wrong done by Defendant aggravated by the kind of willfulness, wantonness, and malice for which the law allows the imposition of exemplary damages. Defendant acted with an evil intent to harm Plaintiff. The conduct was intentional, with conscious indifference to the rights of Plaintiff and without justification or excuse. Plaintiff, therefore, seeks exemplary damages in a sum to be determined by the trier of fact to serve as punishment to deter Defendant from such conduct in similar situations.

9. ATTORNEY'S FEES

- 9.1. Defendant's action and conduct as described herein and the resulting damage and loss to Plaintiff has necessitated Plaintiff retaining the services of The Hakimi Law Firm, P.C.,

THE STATE OF TEXAS
COUNTY OF LEE
This is to certify that the
above is a true and correct
copy of the original
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FEB 28 2006



Plaintiff's Original Petition

1800 St. James Place, Suite 105, Houston, Texas 77056 in initiating this proceeding. Plaintiff seeks recovery of reasonable and necessary attorney's fees.

10. JURY DEMAND

10.1. Plaintiff hereby makes Plaintiff's request for a jury trial in this cause pursuant to Rule 216 of the Texas Rules of Civil Procedure and deposits with the District Clerk of Lee County, Texas the jury fee of thirty (\$30.00) dollars.

11. PRAYER

11.1. WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully prays that Defendant be cited to appear and answer, and that on final hearing of this cause Plaintiff have the following relief:

- 11.1.1. Judgment against Defendant, for actual damages sustained by Plaintiff as alleged herein;
- 11.1.2. Judgment against Defendant, for backpay lost by Plaintiff as alleged herein;
- 11.1.3. Judgment against Defendant, for front pay by Plaintiff as alleged herein;
- 11.1.4. Grant Plaintiff general damages for the damage to Plaintiff's reputation;
- 11.1.5. Pre-judgment interest at the highest legal rate;
- 11.1.6. Post-judgment interest at the highest legal rate until paid;
- 11.1.7. Punitive damages;
- 11.1.8. Damages for mental pain and mental anguish for intentional infliction of emotional distress;
- 11.1.9. Exemplary damages;

THE STATE OF TEXAS) This is a true and correct copy of the
COUNTY OF LEE)
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Plaintiff's Original Petition

- 11.1.10. Attorney's fees;
- 11.1.11. All costs of court expended herein;
- 11.1.12. Such other and further relief, at law or in equity, general or special to which Plaintiff may show Plaintiff justly entitled.

THE STATE OF TEXAS } This is to certify that this
COUNTY OF LEE }
JAN 28 2006 } *Lyk*

FEB 28 2006

[Signature]
Plaintiff's Original Petition

Respectfully submitted,

THE HAKIMI LAW FIRM, P.C.

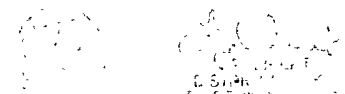


Erica Hakimi
Texas Bar No. 24032262
1800 St. James Place, Suite 105
Houston, Texas 77056
(713) 212-3100
(713) 784-7797 (facsimile)
Attorney-in-Charge for Plaintiff

Hribek/6.01/ original petition

THE STATE OF TEXAS } This is to certify that this
COUNTY OF LEE }
FILED FEB 28 2006

FEB 28 2006



Plaintiff's Original Petition

Mailing address:
P.O. Box 13006
Austin, Texas 78711 or
101 East 15th Street, Room 144T
Austin, TX 78778
www.tchr.state.tx.us



Texas Workforce Commission
Civil Rights Division

September 29, 2005

(512) 463-2642 Main
(512) 463-2643 Fax
(888) 452-4778 Toll Free
(800) 735-2989 Texas Relay

NOTICE OF RIGHT TO FILE A CIVIL ACTION


Erica Hakimi
THE HAKIMI LAW FIRM, P.C.
1800 ST. JAMES PLACE, STE. 105
HOUSTON, TX 77056

Re: *John H. Hribek v. BUC-EE'S, LTD.*
EEOC Complaint #360A501892
TCHR/Local Commission Complaint #

Pursuant to Sections 21.252 and 21.254 of the Texas Labor Code, and Chapter 327, Section 327.7 of the Commission's Rules, this notice is to advise you of your right to bring a private civil action in state court in the above-referenced case. PLEASE BE ADVISED THAT YOU HAVE SIXTY (60) DAYS FROM THE RECEIPT OF THIS NOTICE TO FILE THIS CIVIL ACTION. If the above-referenced case was processed by the United States Equal Employment Opportunity Commission or another agency, you should also notify that agency as to your intention to file a civil action.

If your case has been successfully resolved by the U. S. Equal Employment Opportunity Commission or another agency through a voluntary settlement or conciliation agreement, you may be prohibited by the terms of such an agreement from filing a private civil action in state court pursuant to the Texas Commission on Human Rights Act, as amended.

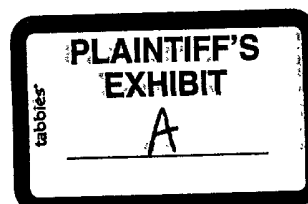
The United States Supreme Court has held in *Kremer v. Chemical Construction Corporation*, 456 U.S. 461 (1982), that a federal district court must generally dismiss a Title VII action involving the same parties and raising the same issues as those raised in a prior state court action under Chapter 21 of the Texas Labor Code. Therefore, filing a lawsuit in state court based on the issuance of this notice of right-to-sue may prevent you from filing a lawsuit in federal court based on Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e - et seq.

Sincerely,

Vickie Covington
Employment Investigations Manager

RETAIN ENVELOPE TO VERIFY DATE RECEIVED

Copy to:

BUC-EE'S, LTD.
327 FM 2004
LAKE JACKSON, TX 77566



THE STATE OF TEXAS
COUNTY OF GALE
FEB 28 2006

FEB 28 2006
CERT-C-NCO2(6/92)

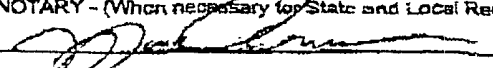
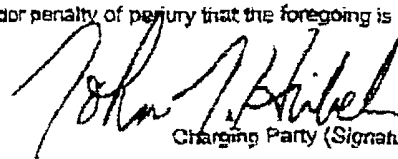
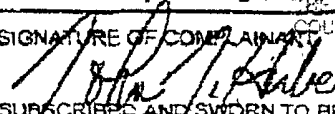
CHARGE OF DISCRIMINATION		AGENCY	CHARGE NUMBER
This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.		<input type="checkbox"/> FAPA <input type="checkbox"/> EEOC	360-2005-01892
<u>Texas Workforce Commission, Civil Rights Division</u>		and EEOC	
NAME (indicate Mr., Ms., Mrs.)		HOME TELEPHONE (include Area Code)	
Mr. John J. Hribek		979-968-3822	
STREET ADDRESS	CITY, STATE AND ZIP CODE	DATE OF BIRTH	
667 S. Meyer	La Grange, Texas 78945	10-30-58	
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)			
NAME	NUMBER OF EMPLOYEES, MEMBERS	TELEPHONE (include Area Code)	
Buc-ee's, LTD.	+ 50	979-230-2920	
STREET ADDRESS	CITY, STATE AND ZIP CODE	COUNTY	
327 Fm 2004	Lake Jackson, TX 77566	Lee County	
NAME	NUMBER OF EMPLOYEES, MEMBERS	TELEPHONE (include Area Code)	
STREET ADDRESS	CITY, STATE AND ZIP CODE	COUNTY	
CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))		DATE DISCRIMINATION TOOK PLACE	
<input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input checked="" type="checkbox"/> AGE <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> DISABILITY <input type="checkbox"/> OTHER (Specify)		EARLIEST (ADEA/FEPA) LATEST (ALL) Oct. 5, 2004 <input type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):			
Please see attached.			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - (When necessary for State and Local Requirements) 	
I declare under penalty of perjury that the foregoing is true and correct.  Date: 2-10-05 Charging Party (Signature)		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT:  SUBSCRIBED AND SWORN TO BEFORE ME THIS 10 Feb 2005 (Day, month, and year)	

EXHIBIT C

C.A. NO. 13,050

JOHN J. HRIBEK	§	IN THE DISTRICT COURT OF
	§	
VS.	§	LEE COUNTY, TEXAS
	§	
BUC-EE'S, LTD.,	§	
A/K/A BUC-EE'S, INC.	§	21 ST JUDICIAL DISTRICT

DEFENDANT'S ORIGINAL ANSWER

Defendant, Buc-ee's, Ltd., pursuant to the Texas Rules of Civil Procedure, files this Original Answer and in support thereof, would respectfully show unto the Court as follows:

GENERAL DENIAL

Defendant generally denies the allegations contained in Plaintiff's Original Petition, as well as any other amended or supplemental petition filed hereafter, and demands strict proof by a preponderance of the evidence of all Plaintiff's allegations, if Plaintiff can do so.

FIRST DEFENSE

Plaintiff must mitigate any and all alleged damages, and Defendant is entitled to an offset for any amount Plaintiff earned or reasonably should have earned.

SECOND DEFENSE

Plaintiff's claims for punitive damages are barred because Defendant did not possess malice or reckless indifference that it may have been acting in violation of state or federal law.

THIRD DEFENSE

Plaintiff's claims for punitive damages are barred because any discriminatory employment actions taken by agents of Defendant were contrary to Defendant's good-faith efforts to comply with Chapter 21 of the Texas Labor Code and all other applicable statutes.

FOURTH DEFENSE

Plaintiff's claims for disability discrimination and violations of the Family Medical Leave Act ("FMLA") are barred because Plaintiff released and/or waived any such claims against Defendant.

WHEREFORE, PREMISES CONSIDERED, Defendant, Buc-ee's, Ltd., prays that upon final trial and hearing hereof, Plaintiff takes nothing against it, but that it go hence without delay and recover its costs, fees, and expenses, and for such other further relief to which it may show itself justly entitled, both in law and at equity.

Respectfully submitted,

MARTIN, DISIERE, JEFFERSON & WISDOM, L.L.P.

By: W. Jackson Wisdom

Elizabeth Mata Kroger
State Bar No. 13184385
W. Jackson Wisdom
State Bar No. 21804025

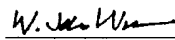
808 Travis, Suite 1800
Houston, TX 77002
Telephone: (713) 632-1700
Facsimile: (713) 222-0101

ATTORNEY FOR DEFENDANT
BUC-EE'S, LTD.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing pleading has been served *via* certified mail, return receipt requested, on this the 2ND day of March, 2006 to:

Erica Hakimi
The Hakimi Law Firm, P.C.
1800 St. James Place, Suite 105
Houston, TX 77056



W. Jackson Wisdom

EXHIBIT D

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EXHIBIT E

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

JOHN J. HRIBEK

Plaintiff

v.

BUC-EE'S, LTD.,
A/K/A BUC-EE'S, INC.

Defendant

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CIVIL ACTION NO. _____

LIST OF COUNSEL OF RECORD

Defendant, Buc-ee's, Ltd. file with its Notice of Removal this List of Counsel of
Record:

1. Counsel for Plaintiff, John J. Hribek

Erica Hakimi
State Bar No. 24032262
The Hakimi Law Firm, P.C.
1800 St. James Place, Suite 105
Houston, TX 77056
Telephone: (713) 212-3100
Facsimile: (713) 784-7797

2. Counsels for Defendant, Buc-ee's, Ltd.

Elizabeth Mata Kroger
State Bar No. 13184385
Fed. I.D. No. 14166
MARTIN, DISIERE, JEFFERSON & WISDOM, L.L.P.
808 Travis, Suite 1800
Houston, TX 77002
Telephone: (713) 632-1700
Facsimile: (713) 222-0101

W. Jackson Wisdom
State Bar No. 21804025
Fed. I.D. No. 13753
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Facsimile: (713) 222-0101